

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

EVERYTOWN FOR GUN SAFETY ACTION FUND, INC.,	:	Civil Action No. 1:21-cv-08704-PGG-RWL
	:	
Plaintiff,	:	
	:	
v.	:	
DEFCAD, INC.; ODYSEE USER	:	
XYEEZYSZN; DEFCAD USER	:	
XYEEZYSZN; ODYSEE USER	:	
THEGATALOG-PRINTABLEMAGAZINES;	:	
THE GATALOG; DEFCAD USER	:	
FREEMAN1337; TWITTER USER	:	
XYEEZYSZN; PHILLIP ROYSTER.	:	
	:	
Defendants.	:	
	:	

**DECLARATION OF MEAGHAN H. KENT IN SUPPORT OF
MOTION TO WITHDRAW AS COUNSEL FOR PLAINTIFF**

I, Meaghan H. Kent, declare as follows:

1. I am counsel for Plaintiff Everytown for Gun Safety Action Fund, Inc. (“Everytown”) in the above-referenced action. I am over the age of 18, have personal knowledge of the facts and events referred to in this Declaration, and if called as a witness could and would competently testify to the matters stated below.
2. I make this Declaration in support of my motion to withdraw as counsel for Plaintiff Everytown.
3. This declaration is submitted pursuant to Local Civil Rule 1.4.
4. As of October 1, 2022, I will no longer be a partner with the law firm Venable LLP.
5. Everytown has been notified and consents to my motion to withdraw as counsel.

6. Everytown will continue to be represented in this matter by its counsel of record Marcella Ballard, Maria Sinatra, and Alicia Sharon from the law firm of Venable LLP.

7. My withdrawal will not materially affect the interests of Everytown or interfere with these proceedings.

8. The case is in the early stages. No Answer has been filed yet. Discovery is ongoing, and no trial date has been set.

9. Venable LLP is not asserting a retaining or charging lien.

10. In view of the foregoing, I respectfully request the Court enter an order withdrawing my appearance as counsel for Everytown.

I declare under penalty of perjury that the foregoing is true and correct. Executed within the United States.

Dated: September 30, 2022

/s/ Meaghan H. Kent
MEAGHAN H. KENT